

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	CASE NO. 18-06720/EAG
	*	
JOSE LUIS ROSARIO PEREZ	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR’S REPLY TO TRUSTEE’S *MOTION TO DISMISS* DOCKET NO. 49  
AND IN COMPLIANCE WITH ORDER, DOCKET NO. 51.**

TO THE HONORABLE COURT:

**NOW COMES, JOSE LUIS ROSARIO PEREZ**, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee’s Motion to Dismiss*, Docket No. 49, whereby the Trustee requests the Court to dismiss the present Chapter 13 case based on Plan arrears incurred by the Debtor, in the sum of \$1,320.00, in the above captioned case.

2. On July 15, 2022, this Honorable Court issued an *ORDER*, Docket No. 51, whereby the Debtor is Ordered to reply within 30 days to the *Trustee’s Motion to Dismiss* (Docket No. 49), which Order is due by August 12, 2022.

3. The Debtor hereby respectfully submits that on July 14, 2022, he made one (1) \$880.00 payment to the Trustee, registered with the Trustee on July 21, 2022 additionally, on July 27, 2022, the Debtor made one (1) \$440.00 payment to the Trustee confirmation number 945498053, for a total payment of \$1,320.00, respectively, to cure all arrears in the confirmed Plan.

4. The Debtor respectfully submits that he is up-to-date in the confirmed Plan payments, thus, respectfully requests the Court to deny the *Trustee’s Motion to Dismiss*, Docket no. 49, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing Reply to the *Trustee's Motion to Dismiss*, Docket No. 49, and in compliance with *Order* dated July 15, 2022, Docket No.51, in the above captioned case.

**I HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using the CM/ECF filing system which will send notifications od such to the Chapter 13 Trustee and to all CM/ECF participants; I also certify that I have mailed by United States Postal Services copy of this motion to the following non-participant: the Debtor, Jose Luis Rosario Perez, RR36 Box 7524, San Juan PR 00926, in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 27<sup>th</sup> day of July, 2022.

**/s/ Roberto Figueroa Carrasquillo**  
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